

1 Marc V. Kalagian
2 Attorney at Law: 4460
3 Law Offices of Rohlfing & Kalagian, LLP
4 211 East Ocean Boulevard, Suite 420
5 Long Beach, CA 90802
6 Tel.: 562-437-7006
7 Fax: (562)432-2935
8 E-mail rohlfing.kalagian@rksslaw.com

5 Attorneys for Plaintiff
6 Jose E. Flores

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

1 JOSE E. FLORES,) Case No.: 2:14-cv-00806-JCM-GWF
2 Plaintiff,)
3 vs.) PLAINTIFF'S UNOPPOSED MOTION
4) FOR EXTENSION OF TIME TO FILE
5 CAROLYN W. COLVIN, Acting) HIS MOTION FOR REVERSAL
Commissioner of Social Security,) AND/OR REMAND
6 Defendant.)
7 _____)

TO DEFENDANT MICHAEL J. ASTRUE, AS THE COMMISSIONER OF
SOCIAL SECURITY, AND TO HIS ATTORNEYS OF RECORD:

Plaintiff Jose E. Flores, by and through his attorneys of record, respectfully requests an extension of time to and including September 26,2014, in which to file his motion for reversal and/or remand. Marc V. Kalagian requires additional time to allow him to properly research the issues to prepare the motion for reversal and/or remand or otherwise plead.

This request is being filed as a motion because due to the press of business and vacation scheduling the attached Stipulation to Extend Time did not get filed

1 on time. Plaintiff's Counsel contacted Jean M. Turk, counsel of record for
2 defendant, and Ms. Turk does not oppose this motion.

3 DATE: September 5, 2014 Respectfully submitted,

4 LAW OFFICES OF
5 ROHLFING & KALAGIAN, LLP

6 */s/ Marc V. Kalagian*

7 BY:

8 Marc V. Kalagian
9 Attorney for plaintiff Jimmy Gregory

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**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:14-CV-00806-JCM-GWF**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on September 5, 2014.

I certify that all participants in the case are registered CM/ECF users and
that service will be accomplished by the CM/ECF system.

Isil Marc V. Kalagian

Marc V. Kalagian
Attorneys for Plaintiff-Appellant

1 Marc V. Kalagian
2 Attorney at Law: 4460
3 211 East Ocean Boulevard, Suite 420
4 Long Beach, CA 90802
5 Tel: (562)437-7006
6 Fax: (562)432-2935
7 E-Mail: rohlfing.kalagian@rksslaw.com
8 Attorneys for Plaintiff
9 JOSE E. FLORES

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOSE E. FLORES,
Plaintiff,
v.
CAROLYN W. COLVIN,¹ Acting
Commissioner of Social Security.
Defendant.

) Case No.: 2:14-cv-00806-JCM-GWF
)
) STIPULATION TO EXTEND TIME
) TO FILE MOTION FOR REMAND
) AND/OR REVERSAL
) (FIRST REQUEST)
)

Plaintiff Jose E. Flores and Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 30 days from August 29, 2014 to September 26, 2014 for Plaintiff to file his Motion for Remand and/or

¹ Carolyn W. Colvin became the Acting Commissioner of Social Security on February 14, 2013. Pursuant to Rule 25(d)(1) of the Federal Rules of Civil Procedure, Carolyn W. Colvin should be substituted, therefore, for Commissioner Michael J. Astrue as Defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the

1 Reversal, with all other dates in the Court's Order Concerning Review Of Social
2 Security Cases extended accordingly. This is Plaintiff's first request for an
3 extension.

4 This request is made at the request of Plaintiff's counsel to allow additional
5 time to fully research the issues presented.

6 | DATE: August 29, 2014 Respectfully submitted,

ROHLFING & KALAGIAN, LLP

/s/ Marc V. Kalagian

BY:

Marc V. Kalagian
Attorney for plaintiff Mr. Jose E. Flores

2 | DATE: August 29, 2014

DANIEL G. BOGDEN
United States Attorney

/s/ Jean M. Turk

BY:

Jean M. Turk
Assistant Regional Counsel
Attorneys for defendant Carolyn W. Colvin
|*authorized by e-mail|

20 | IT IS SO ORDERED:

George Foley Jr.
UNITED STATES MAGISTRATE JUDGE

2 | P A G E

6 Social Security Act, 42 U.S.C. § 405(g). For simplicity, Plaintiff will refer to the
Acting Commissioner as the Commissioner.